# UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

United States of America v. Younes Kabbaj

Case No. 96-cr-205

### MOTION/PETITION FOR WRIT OF ERROR CORAM NOBIS

Introduction (quoted from 10-cv-2274-RWT, Docket #15, District of Maryland)

"Federal courts have the authority to grant relief from a conviction via a writ of error coram nobis after the expiration of a sentence." United States v. Bazuaye, 2010 WL 4366456, \*1 (4th Cir. Oct. 28, 2010) (citing 28 U.S.C. § 1651). "Traditionally, the writ is available only to remedy 'factual errors material to the validity and regularity of the legal proceeding itself." Id. (quoting Carlisle v. United States, 517 U.S. 416, 429 (1996)). "Because the writ is an extraordinary remedy that should issue only under circumstances compelling such action to achieve justice, an error of the most fundamental character must have occurred to warrant issuing the writ, and no other remedy may be available." Id. (quotations and internal bracketing omitted). "The Supreme Court has observed that 'it is difficult to conceive of a situation in a federal criminal case today where a writ of coram nobis would be necessary or appropriate." Id. (quoting Carlisle, 517 U.S. at 429). In order to obtain a writ of error coram nobis, a Petitioner must demonstrate that "(1) a more usual remedy is not available; (2) valid reasons exist for not attacking the conviction earlier; (3) adverse consequences exist from the conviction to satisfy the case or controversy requirement of Article III; and (4) the error is of the most fundamental character." Id. (quotation omitted). Although this writ appeared to have been eliminated in 1946 when Federal Rule of Civil Procedure 60(b) was amended to "abolish[] writs of error coram nobis and other common law forms of relief from judgment," the writ "rose phoenix-like from the ashes of American jurisprudence through the benign intervention of the Supreme Court in United States v. Morgan, 346 U.S. 507 (1954)." United States v. Balistrieri, 606 F.2d 216, 219 (7th Cir. 1979). In Morgan, the Court found that although the writ had been abolished in civil cases, it was available in criminal cases when 28 U.S.C. § 2255 was inapplicable. The Court, however, did not clearly announce which rules of procedure should govern coram nobis proceedings. The Court found that a writ of coram nobis "is a step in the criminal case and not, like habeas corpus where relief is sought in a separate case and record, the beginning of a civil proceeding." Morgan, 346 U.S. at 506, n.4. The Court maintained that "[w]hile at common law the writ of error coram nobis was issued out of chancery like other writs . . . the procedure by motion in the case is now the accepted American practice." Id. The Court found that a motion for the writ "is of the same general character as one under 28 U.S.C. § 2255." Id. This language has led to disagreement among the Circuit Courts as to whether the civil rules or the Rules Governing § 2255 Proceedings should be applied for, among other things, obtaining discovery. On the one hand, certain courts maintain that actions arising under a coram nobis petition are not governed by the Federal Rules of Civil Procedure because the writ is separate and distinct from civil matters. For example, the Ninth Circuit maintains that "a petition for the writ of coram nobis is a step in the original criminal proceedings, not the beginning of a separate civil action." Telink, Inc. v. United States, 24 F.3d 42, 46 (9th Cir. 1994). As such "[a] petitioner resorting to the coram nobis petition seeks to vacate a wrongful criminal conviction; this right differs inherently from the types of substantive rights sought by plaintiffs in purely civil actions." Id. The Ninth Circuit concludes that "[t]he coram nobis petition and a civil action are not of like character." Id. On the other hand, the First, Sixth, and Seventh Circuits maintain that although "a coram nobis motion is a step in a criminal proceeding, [it] is, at the same time, civil in nature and subject to the civil rules of procedure." Balistrieri, 606 F.2d at 221; see also Trenkler v. United States, 536 F.3d 85 (1st Cir. 2008); United States v. Johnson, 237 F.3d 751 (6th Cir. 2001). In Balistrieri, the Seventh Circuit addressed whether on a motion for writ of error coram nobis a district court should apply the Federal Rules of Civil Procedure or the Rules Governing Section 2255 Proceedings, Id. at 218. The court found that a district court can draw from both sets of rules and held that "[i]t is within the district court's discretion to apply the appropriate rules on the basis of facts in each case." Id. at 221; see also Trenkler, 536 F.3d at 94 ("Given the lessons of history, we are convinced that coram nobis proceedings are best seen as hybrids—quasi-civil and quasi-criminal. On this view, the denomination

of the nature of a given petition calls for a functional analysis rather than for doctrinal rigidity."). The Seventh Circuit maintains that §2255 rules are "highly persuasive in deciding how *coram nobis* motions should be conducted." Balistrieri, 606 F.2d at 221. The case law demonstrates that a petitioner in a *coram nobis* proceeding is allowed some form of limited discovery. A majority of courts appear to grant courts the discretion to determine whether the civil rules or the Rules Governing § 2255 Proceedings should apply. As such, the best approach appears to be one that rejects any type of "doctrinal rigidity" and allows a court to determine whether and to what extent discovery is appropriate based on the case before it."

- 01. This Court has subject matter jurisdiction over this proceeding under the All Writs Act, 28 U.S.C. § 1651, and under 18 U.S.C. § 3231. The All Writs Act provides that federal courts "may issue all writs necessary or appropriate in aid of their respective jurisdictions and agreeable to usages and principles of law." 28 U.S.C § 1651(a). Among other things, the All Writs Act fills "the interstices of the federal post-conviction remedial frame work," and an individual may petition a district court to vacate a prior conviction under the All Writs Act where certain criteria are met. See U.S. v Crowell, 372 F.3d 790, 794-95 (9th Cir. 2004).
- 02. Several Circuits have recognized that petitions for *coram nobis* under the All Writs Act may provide post-conviction relief. The Ninth Circuit has found that petitions for *coram nobis* under the All Writs Act can provide relief for persons who have grounds to challenge the validity of their conviction but are not eligible for habeas relief under 28 U.S.C. 2255 because they are not in custody. Matus-Leva v U.S., 287 F.3d 758, 760 (9th Cir. 2002).
- 03. The *coram nobis* writ allows a court to vacate a conviction where the petitioner established that: (1) a more usual remedy is not available; (2) valid reasons exist for not attacking the conviction earlier; (3) adverse consequences exist from the conviction sufficient to satisfy the case or controversy requirement of Article III; and (4) the error is of a fundamental character. Id. (the "4 Prongs of Coram Nobis"). The Petitioner's has satisfied the 4 Prongs of Coram Nobis to be entitled to *coram nobis*, including that he has no other means of challenging the conviction, he has valid grounds for not challenging the conviction sooner, he continues to face adverse consequences if the conviction is not overturned enough to satisfy the case and controversy

requirement of Article III, and the conviction is legally defective and fundamentally erroneous as a matter of law.

## **STATEMENT OF CLAIM**

04. Petitioner incorporates via reference, the attached affidavit describing the background of this dispute going back until at least 1987, which is when the government violence, threats, entrapment plots first began.

05. Petitioner was illegally arrested in the instant case by the DEA on February 13<sup>th</sup>, 1996 (the "DEA Case"). The illegal misconduct engaged against petitioner by federal officials starting since the DEA Case, was never reviewed by a federal court until the petitioner was again illegally arrested by the FBI on March 7<sup>th</sup>, 2016 as documented in District of Delaware Case No. 16-cr-28, which was transferred to Eastern District of Pennsylvania "EDPA" and assigned Case No. 16-cr-365 before being appealed to Third Circuit in Appeal No. 17-2025, 18-1302 and 19-1605 (these 2 District Court cases and three Appeals are thereby collectively referred to herein as the "FBI Case"). It is only through the FBI Case that petitioner was able to confirm that the misconduct originally engaged in the DEA Case is itself a direct violation of 18 USC 4241 (as confirmed by Judge Conti in the FBI Case on 2/6/2019), Rule 11 of the FRCP and other federal laws, Fourth Amendment prohibition upon illegal search and seizure, and other grounds (as also confirmed by Magistrates Mary Pat Thynge, Michael G. Harvey, and Richard Lloret, and District Court Judge Kearney). For that reason, petitioner incorporates via reference as if set forth herein, the entirety of the dockets and all filings made by petitioner in the FBI Case.

06. The rulings issued in the FBI Case thereby make it clear that petitioner could not have entered a voluntary plea in the DEA Case for the same reasons he did not enter a voluntary plea in the FBI Case. Petitioner has been under constant threat of violence from federal officials since

1987 and those threats were never restrained, resolved or even adjudicated to be crimes by the same court. The government instead claims that petitioner is "hallucinating" these threats and thereby suffering from "schizophrenia" and "delusional disorder" since at least 1987 (when the "delusions" allegedly began), in which case the government is instead alleging that the involuntary plea resulted from a violation of 18 USC 4241 rather than a violation of Rule 11.

- 07. To further complicate matters, the Court in the FBI Case has additionally ruled that even if petitioner is not hallucinating the threats being directed against him by the government, that it is still somehow legal for Federal Officials and their constituency (to include the LGBT) to threaten violence against petitioner because he is himself not employed as federal official or member of the LGBT (as documented in the 2255 petition attached in Appendix C1, Pg.153). And to top it all off, the court in the FBI Case further ruled that petitioner cannot even respond by threatening to injure the reputation of the federal officials targeting him, because that is now a crime under the federal threat statutes after the court ruled that the type of injury being threatened by petitioner is no longer an element of the threat statutes (thereby making threats to injure reputation a new federal crime created directly by the judge). Petitioner already suspected that such a ruling was brewing since the DEA Case because he was fully aware that if he attempted to expose the rogue federal agents committing crimes against petitioner (in order to destroy their reputations), that the government would absolutely retaliate by framing petitioner for his "threat to injure reputation" in violation of his First Amendment rights (which is conduct that is now affirmed to be a federal felony as per the rulings issued by the Court in the FBI Case).
- 08. These unprecedented "First Amendment" and other rulings issued in the FBI Case thereby affirm that even if petitioner was illegally threatened with violence in both the DEA Case and FBI Case to get him to enter an involuntary guilty plea, that this activity is not a violation of

Rule 11 or any federal threat statutes because there are now two different standards for application of the First Amendment, one standard for federal officials and the LGBT (which allow them to issue threats of violence against petitioner and his family to deter him from attempting to defend against their crimes), and a different standard for the Muslim petitioner (whereby if he attempts to expose these crimes in order to injure the reputation of the federal officials committing them, that this is itself a federal felony offense punishable by up to 10 years in prison). Thus the rulings in the FBI Case confirm what petitioner suspected (and feared) since the advent of the DEA Case, which is that if petitioner had discloses the crimes committed against him by the DEA to thereby injure their reputations, such whistleblower activity would have certainly been met with all the crimes thereby committed against him in the FBI Case (to include prosecution for a federal "threat" charge for merely disclosing that he is being subjected to illegal threats of violence by federal officials and the LGBT).

#### ILLEGAL PARALLEL CONSTRUCTION

09. The petitioner is also a victim of an illegal federal law enforcement scam known as "parallel construction," which is an unconstitutional law enforcement methodology documented in Appendix C1, Pg.150. The federal investigation against petitioner and his father was illegally initiated by the State Department and CIA in 1987 after petitioner reported a CIA asset in Morocco named Joseph McPhillips as having attempted to molest him. As a result of that incident, the federal authorities thereby attempted to cover-up that scandal by subjecting petitioner's father to illegal surveillance as part of an attempted terrorism entrapment scheme meant to retaliate against them for reporting the attempted molestation in 1987. At the same time the FBI was illegally targeting petitioner's father approximately 1987, the DEA simultaneously recruited the 15-year old petitioner into a DEA Explorer Program for children (without permission from his parents) to

also attempt to entrap petitioner into a federal terrorism conviction and resulting life sentence (especially if the entrapment plots against his father failed, which they did).

- 10. The plot to entrap petitioners father into a terrorism case failed, but the plot to entrap petitioner into a preliminary drug conviction (on the path towards and attempted terrorism conviction) succeeded after the DEA instructed petitioner at 15 years old that it was acceptable for federal agents to deal drugs and commit crimes in order to get information about bigger crimes. As a result of this illegal advice given by the DEA to a child, by 1996 the petitioner had engaged in sporadic low-level crimes (to include electronic "hacking," and also selling small quantities of drugs) to thereby obtain information on murders and terrorism. This is a common practice in the DEA and other agencies (as is clearly demonstrated by the "Fast and Furious" investigation tactics which drew much scrutiny from the public), and so they are the ones who illegally taught petitioner that it was alright to deal small quantities of drugs and to commit other minor crimes in order to obtain information on bigger crimes such as murder (and obviously terrorism).
- 11. By approximately 1993, the DEA was already aware that petitioner had infiltrated one of their major investigations after petitioner disclosed this to them, and thus it is clear that petitioner was illegally placed under surveillance at approximately 17 years of age as part of the "parallel construction" would use to create an illegal justification to arrest him in 1996 (on the path toward a larger parallel construction attempting to entrap him into involvement with terrorism). This is obvious based upon the fact that when petitioner was arrested in 1996 on the instant case, he immediately offered to cooperate on the numerous homicides he witnessed, but his cooperation was illegally blocked because they intended to imprison him with Sheikh Omar Abdel Rahman for the specific purpose of attempting to complete the illegal sting operation attempted against his father (which was not successful). If the DEA had allowed petitioner to cooperate, he would not

have spent one day in jail. If he was not sent to jail, then it would be impossible to place him into contact with Sheikh Rahman to continue the illegal terrorism entrapment plot originally conceived against his father.

- 12. Thus at the time when the DEA illegally prohibited petitioner from being allowed to cooperate in the murder investigations (and obviously wear a wire to directly record the murderers admitting to these serious crimes), they were fully aware that the petitioner was a former Explorer in their program as documented in the 18 USC 3500 materials submitted to petitioner in this matter (Appendix D, Pg.216), which confirm that cooperating witness Asfand Ghazi directly alerted DEA Special Agent Donald Baily of petitioner's involvement in the Explorer program as clearly recorded in his hand-written 3500 notes which state "Younes used to work for DEA, took a course here." If Special Agent Donald Baily was not aware of petitioner's involvement with the DEA Explorer program prior to the arrest of Asfand Ghazi, they he certainly became aware of it after the arrest when Ghazi told them everything about it and when petitioner also informed one of his friends in the DEA about his illegal arrest.
- 13. Furthermore, the petitioner even attempted to pursue a diminished capacity defense as a result of the illegal actions committed by the DEA and others in this matter, and the court refused to allow petitioner to explore these issues in a hearing (including pursuant to 18 USC 4241) to thereby allow him to demonstrate how all these crimes committed against petitioner by the DEA (before he was even arrested by them) clearly contributed to the illegal frame-up plot they devised to try and cover it all up starting since at least 1996. Since petitioner was hanging out with the command structure of the DEA for approximately 6 years prior to his arrest in 1996, there can be no doubt that the DEA Case was a clear result of parallel construction, especially since the FBI falsely affirmed all these facts to be a "schizophrenic delusion" starting since immediately

following the 911 attacks (despite all the evidence to the contrary, which all courts have refused to acknowledge as existing in reality).

14. The entirety of the DEA Case was thereby the result of an illegal "parallel construction" and thus it is a Fourth Amendment violation that requires the entire case to be affirmed as "fruit of the poison tree." Thus it is clear that the moment that federal authorities were tipped off that petitioner and his father were witnesses against one of their illegal pedophile operations in Morocco, they deemed petitioner to be a "national security" threat simply because he was the victim of an illegal attempted molestation. They then plotted to silence petitioner and his father by trying to illegally imprison them starting since approximately 1990. Although the government eventually failed in their attempts to illegally entrap petitioner's father into a falsified terrorism investigation, they instead settled with entrapping petitioner into both the DEA Case and the FBI Case (and the illegal State prosecutions which occurred in between). The constant framing of petitioner in numerous State/Federal cases starting since 1996 cannot be merely just a coincidence.

### THE DEA CASE

15. In the instant case, the DEA arrested petitioner for contributing \$1,000 to a minor drug transaction, and then immediately upon his arrest when petitioner offered to wear a wire and solve numerous unsolved homicides he witnessed, the DEA immediately blocked it and refused to allow petitioner to cooperate because they already knew that the source of their prosecution was an illegal "national security" parallel construction investigation which started in 1987 (and they did not want petitioner to once again report that original crime that provoked the dispute to the federal authorities that illegally arrested him in 1996). Thus the decision by the DEA to refuse to allow petitioner to cooperate and solve numerous murders he witnessed from approximately 1991 to

1996 is clear evidence that there is an underlying "parallel construction" still ongoing from at least 1987 to present. The reason why the DEA wanted to ensure that petitioner was illegally sent to jail despite his clear innocence, is because the agents who were running the terrorism entrapment plots against petitioner's father were hoping to use any such illegal imprisonment to thereby place petitioner into direct contact with the same person they were using to try and entrap his father, which is an individual by the name of Sheikh Omar Abdel Rahman (the spiritual leader of Al-Qaeda).

16. The refusal by DEA to allow petitioner to cooperate thereby led to an exchange of threats between petitioner, the arresting agents and their supervisors (who petitioner was friends with via the DEA Explorer program). The DEA thereby made it clear to petitioner that if he attempted to expose the government plot engaged against him and his father since 1987, that they would "lock him up and throw away the key" (which is a threat issued to him on numerous occasions, to include as recently as 2013). The DEA Agents who arrested petitioner further demonstrated knowledge of petitioner's family in Morocco (which was information only known to the Agents directly involved in the Explorer Program), which petitioner took to also be a threat of violence against his family. And finally, these rogue agents in the DEA informed petitioner that his father was "lucky" to be free himself, but that could "change" if he kept attempting to deny guilt by informing upon his friends in the DEA directly to the Court. As a result of all the illegal threats and illegal actions taken against petitioner both before and after his arrest in the DEA Case (to include prohibiting the petitioner from cooperating to solve homicides despite only being arrested for a low-level drug charge), the petitioner was thereby illegally threatened into entering an involuntary plea.

- 17. After the DEA used illegal threats to force petitioner to plead guilty to a crime he clearly did not commit in 1996, at least one of the DEA Agents involved in the plot had cold feet and eventually leaked an exculpatory audio recording to petitioner that completely disputed the entirety of the DEA's theory of prosecution in the case. A summery of the theory used by the DEA to justify his extreme prosecution is as follows:
- 18. Co-defendant Asfand Ghazi made a deal with a DEA informant to purchase approximately 150 grams of heroin for \$10,000. Ghazi did not have the cash, so he went to his drug customer named Robert to "front" him the \$10,000, but Robert didn't have the full amount and so he only gave Ghazi \$5,000. Ghazi then approached petitioner asking for him to repay a prior debt of \$4,000 to him (for which he would not have gotten any drugs in return), but petitioner could only gather \$1,000 to give him as payment on the prior \$4,000 debt (thereby reducing the debt to \$3,000). When Ghazi made the appointment to go do the drug deal, he asked petitioner to fetch a digital scale he left at petitioner's home prior to a previous trip he took to Pakistan (because he didn't want his family to find the scale while he was away). Petitioner was busy at the time so he could not fetch the scale prior to when Ghazi went to Manhattan to pick up the drugs, but he promised Ghazi that he would drop off the scale later in the evening when he returned from Manhattan.
- 19. Petitioner believed that Ghazi was going to Manhattan to be arrested because he already identified the drug transaction to be a DEA sting, and so petitioner made plans to instead go out on a double-date with his friend Joey Gambetta and two girls whom they were going to take to a nightclub that evening. When Ghazi called petitioner back to inform him that he received the drugs, petitioner was upset (and this is captured on the audio recording made by the DEA of that call) because Ghazi was now imposing upon the plans that he made with his friend Joey Gambetta

and the girls that were waiting for petitioner to pick them up, as petitioner was now being diverted to instead go retrieve the scale and drop it off to Ghazi (who claimed to need it in order to weigh out the drugs he was intending to give to Robert, the actual customer of the drugs). Petitioner then contacted the girls to tell them he would be late to pick them up, at which point he went to retrieve the scale to bring it to Ghazi and those conversations were clearly also recorded by the DEA (which they refused to provide these recordings to petitioner as well). When petitioner arrived at Ghazi's home, it is clear that he was never the recipient of any drugs because he never attempted to take possession of any drugs, nor did he even wish to see the drugs or come anywhere near the drugs (and the video recordings of that event were also illegally withheld from petitioner). All petitioner did was ask Ghazi to come down to pick up his scale because he was in a hurry to go pick up the girls who were still waiting outside on the street. Petitioner and his friend Joey Gambetta were then arrested for no reason whatsoever, as neither of them had anything to do with the drug deal that Ghazi was seeking to consummate with his customer Robert. The DEA immediately released Joey Gambetta, but they refused to release petitioner and instead framed him for the drugs that were supposed to go to Robert.

20. At some point after Ghazi was arrested (and before petitioner was arrested), the actual customer of the drugs (Robert) actually called Ghazi in a phone call recorded by the DEA to thereby ask about his drugs. Ghazi immediately informed Robert that he "lost" the money Robert gave him literally just 1 hour before Ghazi arrived in Manhattan to purchase the drugs, and Ghazi also quickly hung up the phone on Robert to prevent the conversation from continuing. If that recorded conversation had been allowed to continue, it would have clearly confirmed that Robert intended to receive at least 150 grams of heroin from Ghazi for the \$5,000 down payment he provided immediately before Ghazi departed to pick up the drugs for him. Since the DEA were

already illegally targeting petitioner for arrest because of the "parallel construction" investigation initiated against him and his father since 1987, they immediately covered up the existence of the actual customer named "Robert" and instead illegally framed petitioner as the sole recipient of the drugs Ghazi sought to purchase. Of course, that plot could only be successful if the DEA also illegally withheld the exculpatory "Robert" tape from petitioner, and they also needed to instruct Ghazi to lie on the stand and deny the existence of Robert once petitioner's attorney asked about him. When petitioner's attorney finally got Ghazi under oath and asked him if he had spoken to his other customer after being arrested by the DEA, he knowingly lied under oath (and it is also clear the DEA instructed him to do that, because they are the ones who recorded the conversation with Robert to know he exists). Once Ghazi lied, petitioner surprised them all by springing the exculpatory "Robert" tape to thereby prove the illegal conspiracy to frame him.

21. Despite this substantial exculpatory evidence and the extraordinary "Perry Mason" moment in the court when Ghazi was caught lying under oath lying about his conversation with Robert, the Court refused to credit the fact that the governments entire theory of the case completely collapsed and instead charged petitioner with conspiring to distribute the entire 150 grams (which even the Court knew was supposed to go to Robert). Petitioner and his attorney are really the only persons who realized the extreme significance of the crime that had just occurred in Judge Korman's courtroom, and so petitioner had the foresight to immediately secure the audio recording of that entire hearing because it would certainly become relevant at some later point in time. This retrieval of the critical audio recordings of this hearing was a lucky break for petitioner, because when he returned to the Court years later to retrieve the remainder of the recordings for all the other hearings, he was subsequently informed by the Court that all recordings of all hearings were destroyed. By a miracle of g-d the petitioner preserved this critical evidence that he can now

submit to the public to prove he was completely and illegally framed in the original drug case, regardless if the court refuses to do the right thing and eliminate this falsified conviction from petitioner's record.

- 22. Thus because petitioner received the exculpatory audio tape from a mole in the DEA after he had already pled guilty, he could not withdraw the plea without disclosing how he received the evidence which clearly proved that he did not commit the crime for which he was wrongfully framed. Just seeing the content of the exculpatory evidence scared petitioner so much because it was then that he realized the illegal threats to frame petitioner were more than credible. Petitioner decided that the safest thing to do to protect his family from these crimes, is to merely go to prison and serve the sentence imposed by the court until such time as he could learn more about the full nature of the threats being directed against him (as he feared illegal violence may be directed against his family, to include his uncle who was a high-ranking military leader in Morocco at that time). Since petitioner still had not obtained any conclusive proof that the incident which occurred in 1987 was directly linked to the illegal frame-up by the DEA in 1996, or that his friends in the DEA had themselves subjected him to the parallel construction by having another group of Agents illegally arrest petitioner (until after he went to work for the same corporation that he came into dispute with in 1987). Petitioner also did not understand the significance of the Court specifically recommending that petitioner be sent to serve his sentence in Rochester FMC until after he found himself praying side-by-side with Sheikh Omar Adbel Rahman at that same facility (despite the fact that the FBI had already tried to entrap petitioners father into a terrorism conviction with Sheikh Rahman without success).
- 23. Without belaboring all the misconduct that thereby followed as documented in the attacked Appendix, the illegal threats of violence only continued to increase to the point whereby

after the 911 attacks, the FBI, DEA and CIA (and the three overarching terrorism organizations that control them, as documented in the attached affidavit) all started threatening petitioner with bio-WMD holocaust against all Muslims if he disclosed these crimes which were committed against petitioner starting since 1987. This caused petitioner to respond with counter threats and as a result the FBI, DEA and CIA all decided that the best way to cover up this entire scandal, is to illegally impose a falsified history of "schizophrenia" and "delusional disorder" upon petitioner starting immediately following the 911 attacks (and continuing until this day). Anytime petitioner attempts to report any of the crimes he witnessed starting since 1987, the feds would illegally commit petitioner to a hospital upon a claim that he is hallucinating all the murders and other crimes he witnessed (and also hallucinating all the illegal threats of violence being directed against him, his family and all Muslims).

24. Thus from 2001 to 2005, the feds orchestrated for petitioner to be illegally committed to a hospital (and brutally tortured) on 5 different occasions (for approximately 2-3 weeks each time). When these hospitalizations didn't work to deter petitioner from continuing to investigate these crimes, the DEA, FBI and CIA escalated their crimes by parallel constructing a veritable tsunami of falsified and fraudulent criminal cases against petitioner from 2005 to present. In every single false case filed against petitioner from 2005 to present (a total of 4 criminal prosecutions and one violation of supervised release prosecution), the government modus operandi was the same in that they always start off by refused to allow petitioner to defend himself based upon a claim that he was "incompetent" and suffering from a "substantial history of schizophrenia and delusional disorder" going all the way back to his time when he "hallucinated" the molestation attempted against him in 1987. Every time the government attempted this scam, petitioner demanded to have a competency hearing where he can cross-examine the government doctors and

also present the evidence proving that he is not suffering from "delusions," and the government/courts typically delay the hearing until it is impossible to delay it any further upon which time they evade the hearing by simply allowing to petitioner to proceed PRO SE despite simultaneously finding him to be incompetent. When these competency crimes were being committed in State prosecutions taking place from 2005 to 2015, they were not covered by 18 USC 4241, but once the dispute went federal again with the FBI Case in 2016, 18 USC 4241 thereby became the operative statute to govern such matters.

- 25. When petitioner threatened to respond to these continued crimes by engaging a press conference in the Middle East at the end of March 2016 (which would have destroyed the ability of both a Republican or Democratic candidate to win the election), the FBI thereby again retaliated by filing a falsified federal criminal complaint against petitioner in the FBI Case, whereby they again returned to accusing petitioner of "hallucinating" everything he witnessed going all the way back to the attempted sexual molestation which occurred in 1987. The court in the FBI Case thereby found petitioner to be suffering from "schizophrenic delusions" in the hearing which took place on 7/15/2016, and when petitioner responded by threatening to sue the public defenders for deliberately orchestrating for him to be sent to a federal psychiatric facility for his competence to be "restored," the court thereby immediately reversed the incompetency ruling issued on 7/15/2016 and found petitioner competent again by the next hearing (without any proper review of the alleged claims of "delusion" pursuant to 18 USC 4241 to determine the exact how the government is alleging that they are impacting petitioner's ability to pursue a logical defense).
- 26. Based upon the finding of incompetency issued on 7/15/2016, the court also ruled that the illegal threats directed at petitioner (to include at least one email from a federal agent who was threatening to kill petitioner), were all part of the "schizophrenic delusions" that went all the way

back to 1987. This is clearly documented on the transcripts of the court record, as when petitioner filed a motion to dismiss the indictment for selective prosecution because the FBI was refusing to prosecute the persons who were sending him threats of violence starting since 1987, the court responded that it was legal for federal officials and/or the LGBT to threaten petitioner with violence because he is himself not employed as a federal official or member of the LGBT. When the court asked petitioner if he was being threatened with violence to take a plea, the petitioner clearly informed the court that he was being threatened with violence to plead guilty and the court basically discounted that testimony and refused to credit it based upon the prior rulings alleging that everything petitioner witnessed since 1987 is all a delusion (or otherwise not a crime). Thus the court violated numerous rules, statutes and precedents because once the court declared on 7/15/2016 that petitioner was incompetent, the proceedings clearly could not lawfully be allowed to continue until competency was restored (and it could not be restored without the court allowing petitioner to have a hearing under 18 USC 4241 to dispute the "schizophrenia" reports that were being generated by the court starting with the EDNY probation department assigned to supervise petitioner following his release from the illegal imprisonment on the DEA Case in 1998).

27. This illegal misconduct is still ongoing, as the most recently forged "schizophrenia diagnosis" was manufactured against petitioner as recently as 3/19/2018. When petitioner responded to that additional forged report by again demanded a hearing pursuant to 18 USC 4241 to call the government doctor under oath to dispute the diagnosis, the court again denied that motion on 2/6/2019 by essentially declaring that petitioner's competency will remain in "dispute" for the remainder of his life (in complete violation of nearly all of petitioner's constitution protections). With that ruling on 2/6/2019 which represents the only "final" ruling on competency to have been issued since the DEA Case in 1996, the petitioner can finally move forward with this

attack upon the conviction he incurred in the DEA Case because the judiciary is now admitting that competency is not required in order to enter a plea. Petitioner can thereby justify this writ under a myriad of legal theories to include affirming that not only was his 1996 conviction illegal under Rule 11, but that it was also illegal under 18 USC 4241 (in light of the judiciaries ruling of "permanent" incompetency since 1987), and also the Fourth Amendment pursuant to illegal application of a parallel construction against petitioner starting since 1987.

- 28. To complicate matters, petitioner remains under threat of violence after a terrorist attack threatened by Al-Qaeda was essentially provoked to occur by the FBI directly after they illegally detained petitioner to prevent him from conducting the press conference concerning Sheikh Rahman that Al-Qaeda was demanding. Even after his release in 2017, the petitioner continued to receive threats of a terrorist attack being planned for 3/14/2019, and so he posted the threat on his website prior to that attack (as documented in the Appendix C1, Pg.125). The persons threatening petitioner followed through on the attack on that specific date, and petitioner thereby documented the entire procedure on the internet for the entire world to see.
- 29. Furthermore, petitioner can trace at least four of his direct friends that were murdered by the government after becoming witness to these crimes and how they related to the illegal sting operations conducted against his petitioner and his father (to include Raoul Campana, Syed Farooq Ahmed, Max Madrigal and Mohamed Zhiri). The government further threatened petitioner that they were going to give him an "anniversary present" to punish him for the 6/11/2016 attack against the LGBT, and so the government also symbolically murdered Sheikh Rahman on 2/18/2017 (on the one-year anniversary of the email which was used to illegally imprison petitioner in the FBI Case). In this unprecedented environment of brazen and extreme threats, kidnappings,

tortures, assassination and terrorism plots, it was never possible for petitioner to enter any voluntary plea since the threats first started in 1987.

### **RELIEF REQUESTED**

30. Petitioner requests that the court assign him counsel to assist with this instant petition as it concerns a matter of extreme public importance involving threats of WMD terrorism being directed against petitioner and other innocent Muslims, and acts of terrorism and assassination being directed against others (all of which is alleged to be a complete "schizophrenic delusion" by the government despite the substantial and unprecedented evidence provide by petitioner in the appendix attached to this petition to thereby confirm that this is not a hoax pleading). Since the court in the FBI Case has engaged numerous provocative and unprecedented interpretations of law in this long-term dispute, these rulings clearly apply to the related DEA Case (under the "law of the case" doctrine) because petitioner cannot be deemed competent by the judiciary in one jurisdiction, yet simultaneously incompetent in another (nor could it be legal for people to threaten him in one jurisdiction, yet illegal for people to threaten him in another). These legal issues involving the First Amendment, the Fourth and Fifth Amendment, the 8th Amendment and other extreme deprivation of petitioner's constitutional rights, certainly demand assignment of counsel, discovery and a substantial hearing to investigate this extreme and unprecedented scandal.

Submitted 4/1/2019

/s/ Younes Kabbaj

### THIS IS THE MASTER APPENDIX COMPILED FOR ALL RELATED CASES

# **Appendix A1 – The Islamic Mission of America**

Pg.001 Book - Gatherings in Diaspora

Pg.016 Book - Black Pilgrimage to Islam

Pg.022 Book - Muslim Communities in North America

Pg.027 Article - Dar Ul Islam Movement

Pg.030 Article - Tribute from Daoud Haroon

Pg.046 Article - Moslems Observe Day of Sacrifice - NY Times

Pg.047 Article - Aramco Magazine

Pg.048 Article - Mother Khadijah - NY Times

Pg.049 Transcripts - Rodney Hampton-El

Pg.059 Article - Terrorism Investigation

Pg.060 Sheikh Letters

Pg.082 Invitations/Telegrams

Pg.100 Pictures

Pg.125 Certificates

# Appendix A2 - The Islamic Mission of America

Book: Al-Islam The Religion of Humanity

# Appendix A3 – The Islamic Mission of America

Book: Islam The True Faith

# Appendix A4 – The Islamic Mission of America

Pg.001 Magazine - The Islamic News

Pg.025 Attica Lawsuit

Pg.041 Flyers

Pg.053 Kabbaj Letter

Pg.054 Awards

Pg.056 Sheikh Daoud Passport

# Appendix B1 – The American School of Tangier

- Pg.001 Article PrinceMoulayRachidDedicatesAmericanSchoolInMarrakesh.pdf
- Pg.002 Emails exchanged between myself and "Cilvarings" where I provided him samples of my music which he possibly stole from me to include in the so-called "Wu-Tang secret album. I gave him my beats to use in a public album, not a secret album, and when we had the falling out I warned him not to use my music or I would beat him up. He told me that he would not use my music, but I have never been able to hear the secret album to confirm that he didn't try to disrespect me and my hip-hop mafia by trying to steal my music.
- Pg.007 Article describing AST's illegal firing of Cilvaringz' wife, which provoked him to try and blackmail the school with the following email on 2008-06-08
- Pg.012 "Anonymous" email from "Cilvaringz" attempting to blackmail the school with a threat to go public concerning their various financial crimes
- Pg.014 Emails with "Cilvaringz" apologizing to me after I traced the anonymous email to him
- Pg.016 School Memo accusing the former Headmaster of "hacking" the school. It was common for AST officials to falsely accuse anyone they are in conflict with, of hacking them
- Pg.017 Email written by Mark Simpson admitting he lost his USB in the school, where it was later found by an employee and illegal pornography belonging to Simpson was found on the USB. He later falsely claimed that his personal pornography files were obtained through some "hacking" by unknown means, when his email makes it clear he lost his USB without any hacking.
- Pg.018 Email by AST terminating another Headmaster named Mark Fish, and falsely accusing him of psychological disorders. It is common for AST officials to falsely accuse people of psychological disorders after they fall into conflict with them
- Pg.020 Email from myself to AST discussing the Sheikh Rahman situation, which they used as a premise to file false "terrorism" charges against me.
- Pg.022 Letter from AST illegally firing the British Consul Mohamed Zkhiri from the Board because he refused to commit crimes against me on their behalf. AST asked numerous persons to commit crimes against me and when they refused, they were fired
- Pg.023 Letter from AST published to all the parents/children/employees of the school
- Pg.024 Email from the US Embassy to Simpson, proving that the US Embassy was directly involved in the effort to have me (a United States citizen) illegally and falsely arrested in Morocco.

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- Pg.025 Letter from AST to the King of Morocco
- Pg.027 Minutes of AST Board Meeting
- Pg.029 Email I sent to Hillary Clinton and Ambassador Robert P. Jackson complaining about the crimes, whereby he responded to me via email and phone to apologize about the false claims filed by Ambassadors Frank Wisner and Edward Gabriel
- Pg.030 Letter from US Embassy confirming that I never "hacked" them as AST was falsely claiming (on their behalf and without their authorization, although they were lying to the King of Morocco and the police claiming the Embassy was backing them.
- Pg.031 Email from myself to the AST terrorists demonstrating how we traditionally talk to each other for years
- Pg.032 Letters from other AST employees who witnessed these crimes
- Pg.034 Article describing how AST closed a mosque in the school because they are an LGBT organization and so they have always tried to stop Muslims from being Muslim (even in their own country).
- Pg.035 Minutes AST Board Meeting
- Pg.037 Article about Yahya Rouach, the intermediary to the settlement between myself and AST, and the person who crafted the silver box to house Cilvaringz "Wu-tang secret album"
- Pg.039 Apology letter from Stephen Eastman, son of the US Consul Harland Eastman
- Pg.040 Letter from Ambassador Gabriel confirming my employment
- Pg.041 Email where I renounced my Moroccan citizenship. The Moroccan government claims it is illegal for me to renounce my citizenship and they do not recognize my renunciation, even though I was not even born there and never requested citizenship from them to begin with.
- Pg.042 Settlement contract with AST with copy of check.
- Pg.058 Apology letter from Ambassador Gabriel
- Pg.059 Email from Ambassador Gabriel notifying Mark Simpson of the settlement, which he subsequently breached
- Pg.060 Minutes AST Board Meeting
- Pg.063 Emails exchanged between all the parties which resulted in AST filing false charges against me in New York. In one of the emails I am threatening the former Athletics Director of AST concerning his statutory rape of a Moroccan girl, which was covered up by AST, the FBI and the Moroccan government
- Pg.078 False criminal complaint filed against me by AST
- Pg.080 Affidavit in support of false criminal complaint filed against me by AST
- Pg.081 District of Delaware order admitting that they are destroying evidence in the false federal threat case they were already planning to file against me since at least 2014
- Pg.082 Email from Mark Simpson to Edward Gabriel, admitting his friendship with the Manhattan District Attorney Cyrus Vance (who was illegally prosecuting me in New York at that time), and blackmailing Stephen and Harland Eastman because they were part of the AST pedophile ring.
- Pg.084 Another article discussing the silver "Wu-tang" box manufactured by Yahya Rouach
- Pg.086 Order from the Court asserting that "threats of violence" will be treated as a civil matter resulting in sanctions, to include monetary sanctions (and not falsified federal criminal threat cases).
- Pg.088 Email from myself to Yahya Rouach
- Pg.092 Letter from New York prosecutors dismissing false charges filed against me by Mark Simpson
- Pg.093 Email from AST threatening me and using the email of a Federal Judge in Florida to do it.
- Pg.094 Order by the Court refusing to recuse themselves despite alleging that they were illegally threatened by me, all of which took place long before they filed the false threat charges.
- Pg.095 Certified dismissal of the false charges filed by AST against me in New York
- Pg.096 Email from the New York court admitting that the prosecutors could not prove their case beyond a reasonable doubt, despite my very graphic threats of violence against AST (because they were caught illegally threatening me to incite me).
- Pg.097 Another article describing the Wu-tang "secret album," which may contain music stolen from me by Cilvaringz
- Pg.099 These are some of the internet traces confirming that all the illegal threats and defamation published against me, did indeed originate with AST as I knew all along
- Pg.106 These are some articles documenting the life and death of Joseph McPhillips, prolific pedophile in Morocco since the 1960s
- Pg.115 These are some articles documenting Oliver Stone and his wife, Najwa Sarkis, who were involved with AST for many decades. My mother used to work directly with Najwa Sarkis at the Moroccan Mission, I attached one of her employment letters.
- Pg.117 Books documenting known AST agents who are directly affirmed to be pedophiles (and quite openly so).
- Pg.122 These are my report cards from when I attended AST in 1987 (when the Headmaster Joseph McPhillips attempted to molest me.

# Appendix B2 - The American School of Tangier

Evidentiary archive of Ambassador Edward M. Gabriel's lobbying activities on behalf of the King of Morocco

# **Appendix C1 – The Federal "Threat" Case**

- Pg.001 Article proving that my Court assigned counsel in the criminal case had lied to me when he claimed that he did not know Magistrate Mary Thynge, the judge I was accused of threatening.
- Pg.002 Email handing my terrorism mediation activities over to AST due to their continued interference with them

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- Pg.004 Email confirming that Donald Trump received my entire dossier regarding Hillary Clinton's illegal involvement with AST, long before the election. I was contacted by someone from his campaign who confirmed they received it and they would call me back, but they never did.
- Pg.005 Marshals reports
- Pg.007 Thynge Email confirming that Larry Seegull engaged and illegal ex-parte conversation with her before forwarding it to her
- Pg.011 FBI Interview with AST's Chuck Kresslein
- Pg.012 Marshals report
- Pg.014 FBI interview with me, which I have a full recording of the conversation to prove 302 form was written in a manner designed to deliberately exclude relevant exculpatory information.
- Pg.015 Marshals reports
- Pg.021 Indictment
- Pg.025 Letter regarding illegal theft of my property by the FBI
- Pg.029 Emails to the Public Defenders who were deliberately trying to sabotage my defense.
- Pg.033 Google subpoena response proving that my computer which was stolen by the FBI, had a functioning operating system up until the moment of my arrest and confiscation of the computer.
- Pg.037 More letters/emails from the Public Defenders who were deliberately trying to sabotage my defense
- Pg.041 Letter containing competency report that the Public Defenders maliciously refused to accept in order to continue to deliberately sabotage my case
- Pg.045 More letters/emails from the Public Defenders who were deliberately trying to sabotage my defense.
- Pg.054 Affidavit Family
- Pg.056 More letters/emails from the Public Defenders who were deliberately trying to sabotage my defense.
- Pg.061 Affidavit Family
- Pg.065 Investigative Report from the Public Defenders which they refused to conduct for several months
- Pg.067 More letters/emails from the Public Defenders who were deliberately trying to sabotage my defense.
- Pg.072 FBI interview with Mary Thynge
- Pg.073 Letter Refusal by US government to accept renunciation of my United States citizenship
- Pg.074 FBI Report Computer
- Pg.077 Affidavit Computer expert, confirming serious anomalies contained in the FBI computer report
- Pg.080 Google response confirming that they have no servers located in the State of Delaware, and thus there was never any jurisdiction upon me in Delaware because I never sent any email to Delaware.
- Pg.082 Thynge email to the Prosecutors
- Pg.083 Plea agreement
- Pg.091 Presentence investigation report confirming Thynge lied when she claimed she was suffering extreme emotional stress as a result of my "threat," and confirming the government had been manufacturing false schizophrenia reports against me since the 911 attacks.
- Pg.094 More false and forged schizophrenia diagnosis that the courts refuse to allow me to challenge.
- Pg.107 Emails exchanged with the Probation Department confirming that they forged a false medical report and then covered it up by preventing me from being able to obtain a copy of my own medical file, even though it is against Florida law to prohibit me from obtaining a copy.
- Pg.124 Response from the Chief of Probation in Florida, refusing to allow me to obtain a copy of my medical file.
- Pg.125 Internet archive.org snapshot of my website taken on 1/20/2019 proving that I did place the date of the 3/14 terrorist attack online before it occurred.
- Pg.126 Copy of the cryptomedia site where the 6/11 terrorist threat was posted starting since 2015.
- Pg.128 Articles documenting another case involving Special Agent Scott Duffey, the same FBI Agent that illegally framed me in this false case using the exact same tactics used against Mr. Toby Lopez, as documented in these articles.
- Pg.141 A copy of the defensive website I placed online from 2015-2016 in response to the crimes being committed against me.
- Pg.150 An article describing the illegal law-enforcement tactic of "Parallel Construction."
- Pg.153 18 USC 2255 Petition filed in EDPA Case No. 16-cr-365, ECF#201

# **Appendix C2 – The Federal "Threat" Case**

Transcripts for all proceedings: District of Delaware Case No. 16-cr-28 and Eastern District of Pennsylvania Case No. 16-cr-365

# **Appendix D – The Terrorism Investigation**

- Pg.001 Article Ambassador Frank G. Wisner's involvement with Sheikh Rahman.
- Pg.019 Various articles and books documenting the scandal with Sheikh Rahman
- Pg.023 Article documenting the murder of Mohammed Syed, which I was able to link to the same cell of operatives involving Daoud Gilani, the mastermind of the Mumbai Massacre
- Pg.024 Various articles and books documenting the scandal with Sheikh Rahman
- Pg.038 Articles documenting the illegal physical abuse of Sheikh Rahman that I witnessed directly when I was in that same prison with him.

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- Pg.040 Various articles documenting the standoff I had with the government following the 911 attacks. When they started threatening me with a bioterrorism attack against the Middle East, I issued a counter threat that I had smuggled nuclear weapons into New York and was going to blow up the entire city if they didn't release him.
- Pg.050 Various articles either describing me, or describing my conduit to Bin Laden.
- Pg.053 Various articles documenting one of the drug rings that helped fund the 911 attacks.
- Pg.060 An email I sent to Mandy Mourad, the journalist who attended my meeting with Sheikh Rahman's lawyer and son in 2009
- Pg.062 Another article documenting one of the drug rings that helped fund the 911 attacks.
- Pg.065 More articles concerning Sheikh Rahman
- Pg.074 Various emails related to this matter.
- Pg.132 My attempt to file a police report concerning the imminent assassination of Bin Laden, which I knew would occur once I attempted to leak his location after I discovered it through a mole in the Pakistani government
- Pg.133 Articles concerning the Marrakesh Bombing, one of them with a member of my family commenting on the attack
- Pg.136 Email from Federal Agent threatening to kill me for reporting the terrorism crimes
- Pg.137 Article further confirming Al-Qaeda direct involvement with Mumbai Massacre
- Pg.139 Article confirming President Mohamed Morsi's attempt to obtain return of Sheikh Rahman
- Pg.141 Letters of Senators opposed to release of Sheikh Rahman
- Pg.144 Sheikh Rahman's lawyers card, which I obtained during my trip to Egypt in 2013 (the day the Egyptian security officials ordered me not to return to his office).
- Pg.145 Emails with myself and the FBI after I left to Egypt, whereby they refused to speak to me after emailing me a request to speak to me.
- Pg.149 More emails concerning Sheikh Rahman
- Pg.154 Letter confirming that my father's friend, Imam Siraj Wahaj, was also a character witness for Rodney Hampton-el
- Pg.160 Article confirming that there is still much information the FBI is hiding about the 911 attacks, to include everything documented in my litigation.
- Pg.162 Article documenting the bombing of the Duroy hotel after I stashed a USB there containing evidence I acquired during my long-term investigation. I also attached my booking for the hotel and a copy of the business card I took to prove I was there.
- Pg.167 Email to the "media wing" of the Islamists
- Pg.169 Transcripts of the DEA lecture series discussing one of the individuals who funded the 911 attacks. This transcript documents the fact that I instructed a member of the Baz Mohamed organization to inform upon them (because the DEA was blocking me from doing it), and so he sent an anonymous letter to them and they admit to receiving it and starting their entire investigation based upon that letter.
- Pg.177 The docket of Ikram Haq and the New Jersey heroin case linked to the murder I witnessed in 1994.
- Pg.179 Various documents proving that I was an inmate at FMC Rochester at exactly the same time as Sheikh Rahman (a fact that the government claims to be a "delusion"). I included a map of the prison which showed where I was located and where he was located.
- Pg.192 Articles documenting the connections between Daoud Gilani and Ikram Haq, the same person who was listed as a suspect in the 1994 Murder that I witnessed and knew was related to Al-Qaeda (at a time before Al-Qaeda was not even publicly acknowledged to exist).
- Pg.211 302 investigative reports proving that the same AUSA Leslie Brown who was obstructing investigation of the murder I knew to be linked to Al-Qaeda, was herself interviewing the main Al-Qaeda terrorists that were prosecuted and convicted alongside Sheikh Rahman.
- Pg.215 Email to Peter Bergen on 3/13/2019 leaking one of the Ramsey Clark recordings, for which terrorists were threatening to retaliate against Muslims with a terrorist attack (which is why the recording was kept secret for 6 years since it was made in 2013, as the threats of violence were preventing it).
- Pg.216 18 USC 3500 evidence confirming the DEA was aware Kabbaj was a member of their explorer program
- Pg.225 Email leaking the recording contained in Appendix G8 to Peter Bergen of CNN and the Islamist media, which resulted in retaliatory terrorism attack the next day.

# Appendix E – Various Evidence

- Pg.001 Affidavit of Danny Cruz
- Pg.003 Various documents/articles concerning the DEA Explorer program and my involvement with it, to include a holiday card sent to my address in Queens, and signed by the leadership of the DEA in New York at that time.
- Pg.008 Various documents/articles concerning Syed Farooq Ahmed, my Pakistani mole who helped me locate Bin Laden in Abbottabad and was killed for it.
- Pg.013 Various documents/articles concerning the "hacker" war triggered by AST and their crimes against me
- Pg.020 A document from my days as a "hacker" which lists several of the BBS systems where I eventually ran into terrorists who were members of other organizations.
- Pg.032 Various documents confirming my involvement with another known hacker crew called Eagle Soft Incorporated. As you can see in these documents, I lived just two minutes away from "Prowl's Place," which was one of the BBS sites operated by the organization. I used to hang with Prowl and his brother almost daily at a period of time, while I was myself running my own hacking crew just down the block from him, where we used to compete with each other and other "hackers" in my neighborhood, which had some of the best hackers in the world (including myself).

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- Pg.045 Documents concerning the illegal prosecution engaged against me by the FBI in Florida in 2005. The federal informant who filed the false charges against me, Marjorie Malone, was again just recently involved in some sort of shootout at her home which the FBI and Sunrise Police Department covered up because of this scandal (but all the neighbors witnessed it because they actually contacted me to inform me about it, and also the entire community was shut down by the police for days while they investigated the shooting. I do not know if anyone died, but they are covering it up because it was really only a matter of time before something like that happened with her.
- Pg.059 Articles/Documents concerning my uncle, General Tamdi
- Pg.069 Articles concerning the fact that Morocco was the first nation to officially recognize the independence of America
- Pg.084 Article concerning an assassination which my uncle is purported to have been involved with.
- Pg.086 Letters from the schools I attended, including a letter confirming that a teacher illegally failed me right before the 911 attacks to try and sabotage my September graduation date. That event caused me to delay my trip to meet with Bin Laden from August of 2001 until October of 2001. The rest is history.

# Appendix F – Additional Relevant News Articles

This is an archive of numerous articles that document crimes I either witnessed or acquired information about that is not public, all as part of my journalism project to document the things I witnessed (which were covered in numerous media outlets). This is not an exhaustive list, as there are many other crimes and incidents which I witnessed and documented (and which were independently covered by the media).

# Appendix G – Audio and Video Evidence Relevant to This Dispute

The following are YouTube links to various audio and video recordings relevant to this dispute. Please see description in the videos for additional information concerning their relevance to this matter.

#### G1 - American School of Tangier Promo Videos

https://www.youtube.com/watch?v=5qzeUuVz9YY https://www.youtube.com/watch?v=80Wib0Abndw

#### G2 - Ambassador Edward M. Gabriel Lobbying Activities

https://www.youtube.com/watch?v=n15-Iqq\_WW0 https://www.youtube.com/watch?v=r7aYuBOamkA https://www.youtube.com/watch?v=ERWD\_AV3lt8 https://www.youtube.com/watch?v=6l6-YMJovrk

 $https://www.youtube.com/watch?v=0VK5s\_WBG9I$ 

https://www.youtube.com/watch?v=sYguxYeJIzE

#### G3 - Videos of Syed Farooq Ahmed, a high-level witness to the 911 attacks who was killed in Pakistan

https://www.youtube.com/watch?v=O6aGcdh9rVohttps://www.youtube.com/watch?v=M1i1tj9FmqM

### G4 - This is a video of convicted serial rapist Mohamed Karimzada picking up a girl at Webster hall

https://www.youtube.com/watch?v=iTsByzGNj

#### G5 - Videos documenting the Lefrak City Drug Conspiracy which involves unsolved homicides still being obstructed by police.

https://www.youtube.com/watch?v=F03fwKwvpZ8

https://www.youtube.com/watch?v=Wqlom-QrQR0

https://www.youtube.com/watch?v=yKhvBpU\_FVo

https://www.youtube.com/watch?v=ceNQrmmqgbI

https://www.youtube.com/watch?v=pqLn\_URCoM8

https://www.youtube.com/watch?v=IW4Hp4KlI0k

### G6 - Video documenting the Islamic Mission of America

https://www.youtube.com/watch?v=Gad6cScBgL0

#### G7 - Videos concerning the scandal involving Sheikh Omar Abdel Rahman

https://www.youtube.com/watch?v=2QdH5w1FAqQ

https://www.youtube.com/watch?v=P16wmidGaDI

https://www.youtube.com/watch?v=FDRvZwyZZJg

https://www.youtube.com/watch?v=DkXpdfD0mO0

https://www.youtube.com/watch?v=lc-mMR1aOoc

https://www.youtube.com/watch?v=0lnDOx1HAMk

https://www.youtube.com/watch?v=g6DZSQEdIWA

https://www.youtube.com/watch?v=Mb0A9aDygCI

#### G8 - Audio of U.S. Attorney Ramsey Clark admitting to his illegal sabotage of the defense of Sheikh Omar Abdel Rahman

2013-07-15 2:15pm	https://www.youtube.com/watch?v=MxrhlQ1NBo4
2013-07-16 5:25pm	https://www.youtube.com/watch?v=DBXz-TD2wDU
2013-07-17 10:10pm	https://www.youtube.com/watch?v=lbli10swBUo
2013-07-18 12:56pm	https://www.youtube.com/watch?v=oq8YunzpvS0
2013-07-18 3:10pm	https://www.youtube.com/watch?v=tHe64vfMo-4

#### G9 - Audio recordings with Rami Hassan

https://www.youtube.com/watch?v=cQ3PfkkJrpY https://www.youtube.com/watch?v=Cj4f9R8GKOk https://www.youtube.com/watch?v=lf04DYYqsJY https://www.youtube.com/watch?v=a3aVDxPqBrs https://www.youtube.com/watch?v=RQx4xAAr1SQ

### G10 - Audio recording of criminal trial in Florida where Kabbaj defended himself PRO SE and won acquittal on all charges

Introduction to trial https://www.youtube.com/watch?v=274Rm-wVZ5A **Prosecutor Opening** https://www.youtube.com/watch?v=XvoNNG3gvTk **Defense Opening** https://www.youtube.com/watch?v=ews-oOw6DH4 Marjorie Malone Direct Exam https://www.youtube.com/watch?v=BlottK2SJD4 Marjorie Malone Cross Exam https://www.youtube.com/watch?v=GaWDnBZDu6Y Marjorie Malone Redirect Exam https://www.youtube.com/watch?v=8sn0LD0gx3E Officer Amanda Curet Direct https://www.youtube.com/watch?v=9XAsUxzScVo Officer Amanda Curet Cross https://www.youtube.com/watch?v=7t1fa0aR8Kg **Prosecutor Rests and Motions** https://www.youtube.com/watch?v=KB85aJmSYJg Lourdes Salgado Direct https://www.youtube.com/watch?v=B-xFCCWQBTE Lourdes Salgado Cross https://www.youtube.com/watch?v=JTV2PbB37k4 Defense Rests and Motions https://www.youtube.com/watch?v=O8Y9uD5F1yo Prosecutor Closing 1 https://www.youtube.com/watch?v=FJZUmblVzOk https://www.youtube.com/watch?v=gjrypW41bCc **Defense Closing** Prosecutor Closing 2 https://www.youtube.com/watch?v=9AuaX37nvwU Jury Instructions https://www.youtube.com/watch?v=yP6WZpC5wtg Verdict https://www.youtube.com/watch?v=K4Cl63u6EN4

#### G11 - Audio recording of federal drug case presided over by Edward R. Korman

Asfand Ghazi Direct Exam
Asfand Ghazi Cross Exam
Attps://www.youtube.com/watch?v=LjA4t0Fby7A
Attps://www.youtube.com/watch?v=av9v8nnQptg
Attps://www.youtube.com/watch?v=BHspYWDIZZ0
Attps://www.youtube.com/watch?v=V=JGNCWfrfc
Attps://www.youtube.com/watch?v=QesY8X03Kok

#### G12 – Conversation confronting Dan Dorsky for his crimes

https://www.youtube.com/watch?v=jzNKMlaFcYY

### G13 - Conversation with FBI, attempting to report terrorism/homicide information they have been obstructing since before 911

https://www.youtube.com/watch?v=s4kWG9qZQr0 https://www.youtube.com/watch?v=9VulmFDjH7E